

1 LINDBERGH PORTER, Bar No. 100091
2 RICHARD H. RAHM, Bar No. 130728
3 ALISON S. HIGHTOWER, Bar No. 112429
4 LITTLER MENDELSON
5 A Professional Corporation
6 650 California Street, 20th Floor
7 San Francisco, CA 94108-2693
8 Telephone: 415.433.1940

9
10 Attorneys for Defendant
11 WELL'S FARGO BANK, N.A.

12
13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16
17 MARIO VELARDE,
18 Plaintiff,
19 v.
20 WELL'S FARGO BANK, N.A.,
21 Defendant.

22 Case No. CV-10-00772 EMC

23 **STIPULATION AND [PROPOSED]
24 ORDER EXTENDING TIME TO
25 EXCHANGE INITIAL DISCLOSURES**

26 **[FED. R. CIV. P. 26 (A)(1)]**

27
28 WHEREAS Plaintiff requested that the parties exchange Rule 26 Disclosures to fill in
any gaps in discovery pending anticipated mediation on April 16, 2012;

29 WHEREAS this Court ordered such disclosures by March 30, 2012 in this and nine
30 other pending cases between plaintiffs represented by the same counsel and Defendant Wells Fargo
31 Bank, N.A. making similar allegations;

32 WHEREAS the exigencies of gathering information for ten cases justifies granting
33 the parties additional time in order to provide complete disclosures;

34 Plaintiff and Defendant hereby stipulate to extend the time to exchange initial
35 disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, by one week, to
36 April 6, 2012.

1 IT IS SO STIPULATED.
2

3 Dated: March 27, 2012
4

5 /s/ Kevin J. McInerney
6 Kevin J. McInerney
7 McINERNEY & JONES
8 Attorneys for Plaintiff
9

10 Dated: March 27, 2012
11

12 /s/ Lindbergh Porter, Jr.
13 LINDBERGH PORTER, JR.
14 LITTLER MENDELSON, P.C.
15 Attorneys for Defendant
16 WELLS FARGO BANK, N.A.
17

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.
19

20 Dated: March 30, 2012
21

22 Firmwide:110032793.1 051995.1020
23

